

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

SHIVA STEIN,

Plaintiff,

Case No. 19-cv-00538-CFC

V.

THE ULTIMATE SOFTWARE GROUP, INC.,  
SCOTT SCHERR, MARC D. SCHERR,  
ALOIS T. LEITER, RICK A. WILBER,  
JONATHAN MARINER, JAMES A.  
FITZPATRICK, JR., and JASON RYAN  
DORSEY,

Defendants.

## **PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), plaintiff Shiva Stein hereby voluntarily dismisses the above-captioned action (the “Action”) with prejudice. Defendants have filed neither an answer nor a motion for summary judgment in the Action, and no class has been certified.

Dated: May 8, 2019

**RIGRODSKY & LONG, P.A.**

**OF COUNSEL:**

**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP**

**Gloria Kui Melwani**  
270 Madison Avenue  
New York, NY 10016  
Telephone: (212) 545-4600  
Facsimile: (212) 686-0114  
Email: [melwani@whafh.com](mailto:melwani@whafh.com)

By: /s/ *Gina M. Serra*

Brian D. Long (#4347)  
Gina M. Serra (#5387)  
300 Delaware Avenue, Suite 1220  
Wilmington, DE 19801  
Telephone: (302) 295-5310  
Facsimile: (302) 654-7530  
Email: bdl@rl-legal.com  
Email: gms@rl-legal.com

*Attorneys for Plaintiff*